

United States District Court		DISTRICT of ARIZONA
United States of America		DOCKET NO.
v. Sergio Bojorquez-Gomez		MAGISTRATE'S CASE NO.
DOB: 1990; United States Citizen	25-00173MJ	
Complaint for a violation of Title 18, United States Code, § 554(a)		

On or about November 20, 2024, in the District of Arizona, **Sergio Bojorquez-Gomez** knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one (1) Girsan 1911 pistol, one (1) PMag chambered in 7.62X39, fifty (50) rounds of 22 caliber Hollow Point ammunition, and eight (8) rounds of 45 caliber ACP ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

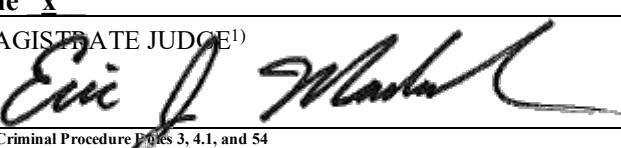
On November 20, 2024, at approximately 6:30 p.m., **Sergio Bojorquez-Gomez** attempted to exit the United States and enter the Republic of Mexico through the DeConcini Port of Entry in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped **Sergio Bojorquez-Gomez** who was driving a red 2014 Buick Enclave bearing AZ license plate number LPA2SY registered to his mother who was his passenger.

CBP officers obtained a negative declaration from **Bojorquez-Gomez** regarding the transportation of firearms, ammunition, or currency in excess of \$10,000. In a subsequent search of the vehicle at secondary inspection, CBPOs discovered one (1) Girsan 1911 pistol, one (1) PMag chambered in 7.62X39, fifty (50) rounds of 22 caliber Hollow Point ammunition, seven (7) rounds of 45 caliber ACP ammunition inside the magazine, and one (1) additional round of 45 caliber ACP ammunition, all concealed in various locations throughout the vehicle.

In a post-*Miranda* statement, **Bojorquez-Gomez** stated he owned the ammunition and the 1911 pistol found inside the vehicle and forgot they were in there. He stated the ammunition was left in the vehicle after **Bojorquez-Gomez** engaged in target practice on an unspecified date, the pistol was purchased three days prior to November 20, 2024, and that he unintentionally had it in his possession. A subsequent purchase history report of the pistol confirmed **Bojorquez-Gomez** purchased the pistol on November 17, 2024.

(BASIS OF COMPLAINT CONTINUED ON REVERSE.)

MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A

DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT NICHOLAS G STATHAKIS Digitally signed by NICHOLAS G STATHAKIS Date: 2025.02.19 15:52:31 -07'00'
AUTHORIZED BY AUSA <i>R. Arellano</i> RAQUEL ARELLANO Digitally signed by RAQUEL ARELLANO Date: 2025.02.19 15:42:24 -07'00'	OFFICIAL TITLE HSI Special Agent Nicholas Stathakis
Sworn by telephone x SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE February 20, 2025

¹⁾ See Federal Rules of Criminal Procedure Rules 3, 4.1, and 54

25-00173MJ

(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)
Page 2 of 3

As the interview progressed, **Bojorquez-Gomez** admitted that on November 14, 2024, he purchased an AR-style rifle and that on November 19, 2024, he sold the rifle. Additionally, on unspecified dates **Bojorquez-Gomez** purchased an M4 Colt rifle, various 9mm pistols, and AK-47 style rifles, for the purpose of reselling. Lastly, **Bojorquez-Gomez** explained that in the past, he transported various firearms intended for Mexico from Phoenix, AZ to Nogales, AZ.

The firearms, magazines, and ammunition found in the vehicle **Bojorquez-Gomez** was driving qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. **Bojorquez-Gomez** did not possess an import/export license nor presented one to the CBPOs.

**(BASIS OF COMPLAINT CONTINUED ON REVERSE.)**

(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)
Page 3 of 3

